

# **EXHIBIT 6**

**Subject:** RE: Wishart v. Welkley et al.

**Date:** Wednesday, April 21, 2021 at 12:12:16 PM Eastern Daylight Time

**From:** Deutsch, Hillel

**To:** Joshua S. Moskovitz

**CC:** rob, Wolfgang Wilke, Melody Haase, Nathan Binder

April 29<sup>th</sup> at 10:00 works for the conference call. If that works for you, please circulate the call-in information and I'll disseminate it to my clients.

Thanks,

Hillel

Hillel Deutsch  
NYS Assistant Attorney General  
144 Exchange Blv. Rochester, NY 14614  
(585) 546-7430

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**From:** Joshua S. Moskovitz <josh@moskovitzlaw.com>

**Sent:** Friday, April 16, 2021 1:51 PM

**To:** Deutsch, Hillel <Hillel.Deutsch@ag.ny.gov>

**Cc:** rob <rob@ricknerpllc.com>; Wolfgang Wilke <wolf@4discovery.com>; Melody Haase <melody@4discovery.com>; Nathan Binder <nate@4discovery.com>

**Subject:** Wishart v. Welkley et al.

**[EXTERNAL]**

Hillel,

Attached is a letter from 4Discovery listing the ESI sources that need to be collected or re-collected in a forensically sound manner. The next steps are as follows:

1. You need to provide 4Discovery mailing addresses for each of the defendants so 4Discovery can mail them collection kits for extracting data from phones they currently use.
2. You will need to arrange a conference call for a representative of 4Discovery to explain to your clients what they need to do to cooperate with the process.
3. You will need to arrange a time for each of your clients to speak with 4Discovery so they can set up the collection kit and connect their phone.
4. During that call, 4Discovery will collect log-in information for any applicable email, social media, Skype, WhatsApp, and iCloud accounts.

5. 4Discovery will then collect cloud-based data, at that time, your client will need to provide 4Discovery any 2-Factor Authorization codes that are required for 4Discovery to access the cloud-based account.
6. For certain social media accounts, 4Discovery will need to request a collection of the account data, which will take a day or two for the social media account to prepare. Your clients will receive an email when those collections are ready for download from their accounts and they will need to let 4Discovery know so that 4Discovery can log in and download the data file.
7. For the cell phones that your clients do not currently use, they will need to send those phones to 4Discovery by putting them in the collection kit when they return it. 4Discovery will mail the phones back when they are finished.

Please let us know promptly if you have any questions.

**Joshua S. Moskovitz**

The Law Office of Joshua Moskovitz, P.C.

392 Central Avenue # 7083 | Jersey City, New Jersey 07307 | Tel. (201) 565-0961 (admission pending in New Jersey)  
14 Wall Street, Suite 1603 | New York, New York 10005 | Tel. (212) 380-7040  
[josh@moskovitzlaw.com](mailto:josh@moskovitzlaw.com) | [www.moskovitzlaw.com](http://www.moskovitzlaw.com)

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